

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

\_\_\_\_\_  
THE UNITED STATES OF AMERICA, and )  
THE COMMONWEALTH OF PENNSYLVANIA, )

Plaintiffs, )

v. )

THE BRADFORD SANITARY AUTHORITY )

Defendant. )  
\_\_\_\_\_

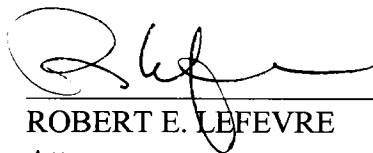
Case No. 03-123E

**UNITED STATES RESPONSE TO DEFENDANT'S MOTION TO  
TERMINATE THE CONSENT DECREE**

The United States of America, on behalf of the United States Environmental Protection Agency, and through its undersigned Counsel, hereby responds to Defendant's Motion to Terminate the Consent Decree:

Defendant has satisfied all of the requirements of the Consent Decree entered by this Court on April 16, 2003, in accordance with Paragraph 61 of the Consent Decree. Accordingly, the United States has no objection to terminating the Consent Decree, as requested by Defendant.

Respectfully submitted,

  
\_\_\_\_\_  
ROBERT E. LEFEVRE

Attorney

U.S. Department of Justice

Environmental Enforcement Section

P.O. Box 7611

Washington, D.C. 20044-7611

(202) 616-8860

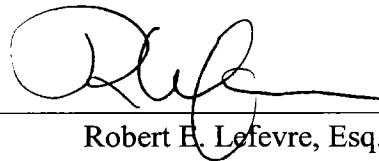
CERTIFICATE OF SERVICE

The undersigned Counsel for the United States hereby certifies that on the 25<sup>th</sup> day of August, 2005, he caused a true copy of the attached document to be served, by U.S. Postal Service, postage prepaid, upon the following Counsel of record:

Richard W. Mutzabaugh  
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Robert E. Lefevre, Esq.



U.S. Department of Justice

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August 25, 2005

Office of The Clerk  
U.S. District Court  
U.S. Post Office & Courthouse  
Seventh Avenue & Grant Street  
Pittsburgh, PA 15219

Re: U.S. v. Bradford Sanitation Authority, No. 03-123E

Dear Sir or Madam:

Please file, on behalf of the United States, the enclosed United States' Response to Defendant's Motion to Terminate the Consent Decree.

Thank you.

A handwritten signature in black ink, appearing to read "R. Lefevre", written over a horizontal line.

Robert E. Lefevre, Esq.  
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